

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE)	
)	
Plaintiff,)	
vs.)	
)	Civil Action No. 02-CV-4440
TRANS UNION, LLC)	
)	
and)	
)	
CITY OF PHILADELPHIA)	
)	
Defendants.)	
)	

NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff Grace Lawrence, by and through undersigned counsel, hereby submits this Notice of Supplemental Authority to bring to the Court's attention recent authority from the Eastern District of Pennsylvania that bears directly on the parties' pending briefing regarding Defendant Trans Union's ("TU's) motion for summary judgment.

On September 16, 2003, in the case of *Crane v. Trans Union, LLC*, CA No. 02-7599 (E.D. Pa. 2003), Judge Stewart Dalzell issued a Memorandum and Order denying a motion for summary judgment filed by Defendant Trans Union, LLC. A copy of the *Crane* Memorandum is attached hereto as Exhibit A. TU's motion in *Crane* presented virtually identical arguments it has asserted in its instant motion regarding its general procedures for reporting credit information and responding to disputes received from consumers, the types of damages available under the Fair Credit Reporting Act, 15 U.S.C. §1681 *et seq.*, and the availability of a private cause of action under the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. 201-9 *et seq.* *Crane* specifically addresses these issues, citing statutory authority and caselaw.

Further, *Crane* allowed the plaintiff's punitive damages claim to proceed to trial on the basis of the deposition testimony from TU's Consumer Relations Manager, Eileen Little, that Plaintiff's counsel has placed before this Court in Plaintiff's Memorandum of Law in Response to TU's Motion For Summary Judgment. *See* Declaration of James A. Francis attached hereto as Exhibit B. Given the *Crane* Court's disposition of these legal arguments and reliance on the evidence taken in this case, Plaintiff submits this decision as supplemental authority to the pending summary judgment briefing.

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

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